

## UNITED STATES DISTRICT COURT

for the  
Southern District of OhioUnited States of America  
v.

MEHDI IDMHAND

Case No. 3:21-MJ-238

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Defendant(s)

## CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.


On or about the date(s) of September 14, 2020 in the county of Montgomery in the  
Southern District of Ohio, the defendant(s) violated:*Code Section*

21 U.S.C. §§ 841(a)(1) &amp; (b)(1)(C)

*Offense Description*Possession with intent to distribute controlled substances, namely,  
Oxycodone, a Schedule II controlled substance

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.  
Complainant's signatureTFO Frederick D. Zollers, FBI  
Printed name and titleAttested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
Telephone (specify reliable electronic means).Date: 6/21/2021City and state: Dayton, Ohio  
Peter B. Silvain, Jr.  
United States Magistrate Judge

**AFFIDAVIT**

I, Frederick D. Zollers, being duly sworn, do hereby depose and state as follows:

**INTRODUCTION**

1. I am a sworn law enforcement officer in the State of Ohio and have been for fourteen (14) years. I am presently a sworn member of the Montgomery County Sheriff's Office. I am currently assigned to the Federal Bureau of Investigation's (FBI) Southern Ohio Safe Streets Task Force (SOSSTF) as a Task Force Officer (TFO). I have received training in drug trafficking investigations and have participated in numerous narcotics-related investigations (ultimately leading to successful prosecution) that involved surveillance, gathering evidence of money laundering, interviewing suspected drug traffickers, and supervising the activities of informants who provided information and assistance which resulted in the seizure of narcotics, firearms, and U.S. currency. I have conducted numerous investigations into the unlawful distribution and possession of controlled substances. Based on my training and experience, I am familiar with federal drug laws, and am aware that it is a violation of Title 21, United States Code, Sections 841(a)(1) and 846 to knowingly and intentionally distribute and possess with intent to distribute controlled substances (including heroin, cocaine, and Oxycodone), as well as to conspire to do the same.

**PURPOSE OF AFFIDAVIT**

2. This Affidavit is submitted in support of a criminal complaint, and seeks the issuance of an arrest warrant against Mehdi Idmhand (hereinafter "**IDMHAND**") for violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) (possession with intent to distribute controlled substances, namely, Oxycodone, a Schedule II controlled substance).
3. Along with other law enforcement agents, I have participated in the investigation of **IDMHAND**

in connection with the conduct detailed in this Affidavit. As part of the investigation, I have, among other things, discussed information with, and/or reviewed documentation and reports provided by, other law enforcement officers. My knowledge of the facts and circumstances set forth in this Affidavit is thus based upon my own personal observations, as well as information I have received from other law enforcement officers involved in the investigation. For purposes of this Affidavit, I have not distinguished between information of which I have direct knowledge and that of which I have indirect knowledge.

4. I have elected not to include in this Affidavit all the factual details gathered to date during the investigation, but rather I have included only certain information sufficient to establish probable cause to believe that **IDMHAND** has committed a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) (possession with intent to distribute controlled substances, namely, Oxycodone, a Schedule II controlled substance).

#### **SUMMARY OF PROBABLE CAUSE**

5. On or about Saturday, September 12, 2020, at approximately 2:08 a.m., Huber Heights Police Department (HHPD) Officers were dispatched to the area of 7111 Harshmanville Road on report of a suspicious vehicle parked in the roadway. Upon arrival, Officer S. Waler observed a black 2012 Chrysler 300 bearing Ohio registration K474430 in the middle of the road blocking the northbound lane of Harshmanville Road.
6. Officer Waler observed a single male occupant, later identified as **IDMHAND**, unconscious in the driver's seat of the vehicle. Upon approaching the vehicle, Officer Waler smelled the raw odor of marijuana emitting from inside of the vehicle and observed a plastic baggie of suspected marijuana on the gear shift controls. As Officer Waler attempted to wake **IDMHAND** through the open

window, he observed the vehicle was still in drive. Officer Waler, assisted by other HHPD Officers, put the vehicle in park and attempted to wake **IDMHAND**. After applying two sternum rubs, **IDMHAND** regained consciousness. Officer Waler spoke with **IDMHAND** and observed **IDMHAND** had slurred speech and could hardly open his eyes as he continued to nod off. In speaking with **IDMHAND**, officers learned **IDMHAND** had taken five Percocet pills when leaving work at approximately 1:00 a.m. Ultimately, **IDMHAND** was transported to Miami Valley Hospital by medic due to being suspected of being impaired and/or under the influence of opiates. **IDMHAND** was issued a citation and criminal summons for driving under suspension and operating a vehicle while impaired.

7. HHPD Officers completed a probable cause search of the vehicle. The vehicle was found to be registered to **IDMHAND**. Officer Waler located and seized a knotted plastic bag containing white pills in the driver's door handle area. Additionally, Officer Waler located and seized a prescription pill bottle containing mixed pills from the driver's door pocket. Sergeant B. Reaman located \$16,019 in U.S. currency and a black fanny pack style bag on the front passenger seat. The fanny pack contained the following items, among others: several prescription pill bottles in **IDMHAND**'s name each containing several mixed pills, a gum container containing several white pills, the title to the Chrysler 300, and a paper pictured ID in **IDMHAND**'s name. Officers located and seized over 900 pills from inside of the vehicle.
8. On or about Monday, September 14, 2020, HHPD Detective E. Hogue conducted a follow-up investigation and spoke with **IDMHAND** via a recorded phone conversation. Among other things, Detective Hogue spoke with **IDMHAND** regarding the large quantity of pills that was located inside of the vehicle. In sum and in substance, **IDMHAND** told Detective Hogue that the pills were his prescribed medication.

9. HHPD Detective Hogue completed an OARRS<sup>1</sup> request for any prescriptions that **IMHAND** had filled in the last three years (09/12/2017 through 09/15/2020). Detective Hogue learned that **IMHAND** had only the following six prescriptions filled from 06/08/2020 through 07/28/2020:
- a. 06/10/2020 – Gabapentin 300mg, QTY 60
  - b. 06/10/2020 – Oxycodone HCL 5mg tablet, QTY 5
  - c. 06/16/2020 – Oxycodone Acetaminophen 5-325, QTY 28
  - d. 06/19/2020 – Gabapentin 300mg, QTY 15
  - e. 06/23/2020 – Gabapentin 600mg, QTY 90
  - f. 07-28-2020 – Gabapentin 300mg, QTY 90
10. The pills recovered from the vehicle were submitted to the Bureau of Criminal Investigation (BCI) Crime Laboratory to be analyzed for content. Of the twenty-nine (29) submissions submitted to the BCI crime laboratory, thirteen (13) submissions tested positive for Oxycodone (Schedule II). The other submissions tested positive for additional controlled substances (Schedule III, IV, and V) and non-controlled substances. The following submissions tested positive for Oxycodone (Schedule II):
- a. One hundred fifty-seven (157) pills found to contain Oxycodone (referenced strength: 5mg/325mg) having a net weight of 58.68g +/- 0.04g.
  - b. One hundred thirty-seven (137) pills found to contain Oxycodone (referenced strength: 7.5mg/325mg) having a net weight of 71.78g +/- 0.04g.
  - c. Two (2) pills found to contain Oxycodone (referenced strength: 7.5mg/325mg) having a net weight of 0.37g +/- 0.04g.

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<sup>1</sup> OARRS stands for Ohio Automated Rx Reporting System. OARRS is a tool to track the dispensing and personal furnishing of controlled prescription drugs to patients.

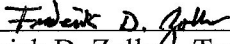


- d. One hundred eighty-five (185) pills found to contain Oxycodone (referenced strength: 7.5mg/325mg) having a net weight of 69.23g +/- 0.04g.
- e. One (1) pill found to contain Oxycodone (referenced strength: 7.5mg/325mg) having a net weight of 0.53g +/- 0.04g.
- f. Two hundred six (206) pills found to contain Oxycodone (referenced strength: 10mg/325mg) having a net weight of 78.00g +/- 0.04g.
- g. Two (2) pills found to contain Oxycodone (referenced strength: 5mg) having a net weight of 0.10g +/- 0.04g.
- h. Two (2) pills found to contain Oxycodone (referenced strength: 7.5mg/325mg) having a net weight of 0.50g +/- 0.04g.
- i. Ten (10) pills found to contain Oxycodone (referenced strength: 5mg/325mg) having a net weight of 0.38g +/- 0.04g.
- j. Twelve (12) pills found to contain Oxycodone (referenced strength: 7.5mg/325mg) having a net weight of 0.38g +/- 0.04g.
- k. Ten (10) pills found to contain Oxycodone (referenced strength: 10mg/325mg) having a net weight of 0.37g +/- 0.04g.
- l. One (1) pill found to contain Oxycodone (referenced strength: 5mg) having a net weight of 0.10g +/- 0.04g.
- m. Forty-nine (49) pills found to contain Oxycodone (referenced strength: 5mg/325mg) having a net weight of 0.37g +/- 0.04g.


11. Given the volume of pills and bulk cash recovered from **IDMHAND**, I believe that he was illegally trafficking oxycodone and other prescription pills to drug addicts in exchange for cash. Notably, per OARRS, he appears to have lacked prescriptions for hundreds of oxycodone pills recovered

from his car. Additionally, based on my training and experience, I know that the quantity of pills found within the vehicle far exceed personal use amounts of these drugs. The large amount of cash recovered from the bag in the vehicle is also consistent, based on my training and experience, with drug trafficking activity.

12. Based on a review of **IDMHAND**'s criminal history, I know that **IDMHAND** has a prior felony conviction from July 2019 in the Montgomery County Common Pleas Court, case number 2019CR00354, for F3 "Possession of Marihuana." Furthermore, **IDMHAND** is currently under indictment in the Montgomery County Common Pleas Court, case numbers 2021CR00921 and 2021CR00928, for felony possession of controlled substances, including Fentanyl, Oxycodone, Alprazolam, and Clonazepam.
13. Based on the facts set forth in the Affidavit, there is probable cause to believe that, on or about September 14, 2020, in the Southern District of Ohio, **IDMHAND** committed a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) (possession with intent to distribute controlled substances, namely, Oxycodone, a Schedule II controlled substance).

  
Frederick D. Zolles, Task Force Officer  
Federal Bureau of Investigation  
Southern Ohio Safe Streets Task Force

Subscribed and sworn to before me this 21<sup>st</sup> day of June 2021.

  
Peter B. Silvain, Jr.  
United States Magistrate Judge

